

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

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MEMORANDUM

DATE: **MAR 14 1999**

TO: ACP Policy Manual

FROM: Roger D. Randolph, Director
Air Pollution Control Program *RDR*

SUBJECT: Definition Concerning Emissions Limit on Large Appliance Topcoat Final Repair

This memo addresses the question of what types of appliances qualify for emission limits on topcoat final repair. This is in response to a request for classification of equipment manufactured at Labconco Corporation. The definitions used to make this determination are explained below.

The Environmental Protection Agency (EPA) document "Control of Volatile Organic Emissions from Existing stationary Sources Volume V: Surface Coating of Large Appliances" defines large appliances as including doors, cases, lids, panels, and interior support parts of residential and commercial washers, dryers, ranges, refrigerators, freezers, water heaters, dishwashers, trash compactors, air conditioners, and other associated products. This EPA document was used for writing our rule so the definition applies to Missouri State Rule 10 CSR 10-2.230, *Control of Emissions from Industrial Surface Coating Operations*. Missouri State Rule 10 CSR 10-6.020, *Definitions and Common Reference Tables* defines final repair as the final coatings applied to correct topcoat imperfections. Therefore, the 6.5 LB VOC/gal coating emission limit would apply when coating is used to correct topcoat imperfections on a large appliance. If appliances being manufactured meet these criteria, then records must be kept to ensure compliance with the emission limit.

RDR:jwp